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PATENT

20973-15

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Claims 18-66 remain pending in the present Application. It is respectfully submitted that the pending claims define allowable subject matter.

In response to the objection to claims 19-66, the preamble of each dependent claim has been amended to add the word "portable". As this is the only claim amendment, it is submitted that the claims have not been amended in a manner that would warrant denying entry of this after final amendment.

The claims have been rejected based upon various combinations of the prior art to Busack, Barstow, Koehler, Khosla and Rallison. Applicants respectfully traverse these rejections for reasons set forth hereafter.

The independent claims 18 and 36 have been rejected as being obvious based upon the combined teachings of Busack, Barstow and Koehler. Applicants respectfully traverse this rejection. It is submitted that the combined teachings of Busack, Barstow and Koehler fail to teach or suggest a portable wireless hand held device having the claimed receiver, signal processing logic and display of claim 18, nor the receiver, signal processing logic, display and user interface of claim 36. In particular, the prior art does not teach or suggest that it is desirable to provide a portable device that can be used at an event, where the device has a receiver that receives video content from a plurality of cameras located at the event and permits a user to select video content from at least one of the cameras.

In the outstanding Office Action, it is maintained that Busack discloses a device 40, 42 that is used "at an event" by a user while watching the event. The undersign respectfully disagrees. Busack does not provide any such teaching. The device 40, 42 of Busack is not used at an event, nor is there any suggestion in Busack (or elsewhere in prior art) that the device 40, 42 of Busack would or could be used at an event while the user watches the event live. Instead, Busack's teachings are quite clear that the computer 40 and keyboard 42 are to be used remote from the event. In the Background section, Busack notes that television broadcasts only allow viewers to see cars which are focused upon by the TV camera (column 1, lines 15-17). Only the lead cars are generally the focus of the broadcaster's attention. Busack goes on to note that

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people who watch auto racing on TV are also interested in the activities of other drivers and thus such viewers may only be able to see their favorite car or racer once or twice during the entire race if their favorite car is not among the leaders in the race (column 1, lines 17-24). The forgoing discussion of conventional TV coverage, and the problem that Busack wishes to overcome, only make sense when the viewer is not attending the event. The problem addressed by Busack is only true for viewers who are watching the event remotely on TV. It does not make sense that a viewer, who is attending an event, could not watch their favorite car and racer live during the event. Instead, it is clear that the problem that Busack's invention intends to solve is a problem only for remote viewers who are not attending the event live.

Further, when the Disclosure of the Invention section of Busack is considered, it is again clear that Busack's invention is intended for viewers who are remote from the event. Busack states that an aspect of the invention is to provide a system in which an accurate replication of each vehicle is made during the race. The system provides for replicating, not only the position of the cars but also their attitude on the track (column 1, lines 55-64). An individual who is attending an event live would not find any value or interest in viewing computer generated replications of each vehicle, as the viewer attending the event would be able to see the actual cars live. In addition, given the time needed to generate a computer replication of the race, a delay would be introduced such that a person attending the event would see the actual position of a car and its actual attitude well before the computer generated replication could be presented on Busack's monitoring system. Busack's replication would only be of interest and have value to individuals who are not attending the event, but instead were remote. Also in the Disclosure of the Invention section, Busack states another aspect of the invention is to present a race over the Internet. A person attending the event would not be interested in viewing a replication of the event routed over the internet and then returned to a person sitting in the stands.

Moving into the Best Mode for Carrying of the Invention section of Busack, it is further clear that the computer 40 and keyboard 42 are intended for remote use. At column 3, lines 24-32, Busack explains that a mainframe computer 36 is interconnected with the World Wide Web 38 to provide the capability of transmitting to any computer 40 which has access to the internet. Each computer 40 can select any desired vehicle for monitoring during any point in the race. It

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would not make sense for Busack's system to implement a mainframe computer 36 that establishes an internet connection 38 and rebroadcasts video and audio to computers 40 located at the event. The route through the World Wide Web would introduce an undesirable amount of delay and uncertainty in connection with Busack's simulation or replication of a race. Thus, it is clear that Busack's computers 40 and keyboards 42 are not for use by a user at an event.

The references to Barstow and Koehler fail to make up for the deficiencies of Busack. Koehler describes a system for listening to and viewing race events where remote computers 42 are interconnected over the internet to a server. The devices in Koehler's system are also remote from the event and afford individuals the ability to listen to and watch races from the convenience of their home over their computer. Thus, Koehler's and Busack's teachings are cumulative, to the extent that both only teach that it is desirable to provide a remote viewer with information related to an event over the Internet where the remote viewer monitors the event from a remote computer. No other reference has been cited to make up of this deficiency.

Barstow fails to make up the deficiencies of Koehler and Busack. Barstow describes a method of encoding and broadcasting information regarding live events. In Barstow's system, an observer at an event uses a computer to enter start and end times and related textual information in connection with individual events. The observer, at the event, in Barstow's system is not viewing video content associated with the event from multiple cameras, but instead is entering into a computer start and end times and other event related statistical data to be compiled in a database and subsequently used by a remote viewer. The remote viewer in Barstow's system is not afforded with the ability to select between video content from multiple cameras. Instead, Barstow's remote viewer is permitted the ability to view individual subevents (e.g., individual plays in a game) where the subevents are partitioned within the overall event based upon the start and end time information entered by the observer. The remote viewer may view the individual subevents from a database. Barstow's viewer is not permitted to select between video content from a plurality of cameras located at the event while roaming at the event. Thus, the combined teachings of Busack, Koehler and Barstow fail to teach or suggest the claim invention of claim 18. In view of the foregoing, it is respectfully submitted that a prima facie case of obviousness

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has not yet been made as a fundamental component of the claimed invention is entirely lacking from the prior art.

Turning to independent claim 36, it is respectfully submitted that the prior art fails to teach or suggest the claimed hand held device. Claim 36 defines a receiver that receives image content from a plurality of cameras at an event, signal processing logic to process the image content, a display to display images and a user interface for selecting at least one of the images from the plurality of sources for viewing by the user on the display. The receivers are configured to receive the image signals while at the event and where the event is occurring thereby permitting the user to carry the receiver about the event and chose where to view the selected image signal while roaming about the event during the event.

As explained above, the prior art fails to teach or suggest any such combination. Busack does not teach the provision of a device at an event. Instead, in Busack's system, the computer 40 and keyboard 42 are remotely located from the event and provide a computer generated replication of the event on a computer at the home or some other remote location to a user.

In addition, it is submitted that the dependent claims recite additional patentably distinct features.

Claims 19 and 20 further define the receiver of the portable wireless handheld device to receive video content that also originates at another event that is remote from the event that the user is attending live. By providing remote video content, in addition to video content from a plurality of video cameras located at the local event, the user is afforded additional viewing options. Claim 21 further recites the additional limitation that the receiver wirelessly receives a plurality of audio signals associated with the event and that the portable user interface allows the user to select one of the audio signals. The prior art fails to teach or suggest this additional limitation of the receiver. Claim 25 further defines the device to have a portable user interface and further defines the receiver to receive a plurality of multiplexed video signals. One of the multiplexed video signals is selected using the user interface. For the avoidance, it should be understood that the multiplexed video signals may be received at the receiver over a common frequency or over separate frequencies. In addition, the video signals may be transmitted from a

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single transmitter or from multiple transmitters. The prior art fails to teach or suggest the reception at a wireless handheld device of a plurality of multiplexed video signals. Thus, the prior art necessarily fails to teach or suggest the use of a user interface that selects one of the multiplexed video signals.

For avoidance of doubt, it should be understood that the present claims are not being distinguished based on any specific type of portable wireless handheld device. For example, the portable wireless handheld device may represent a PDA, a head-mounted display, a binocular-style device, a laptop computer, a cell phone, a blackberry-type wireless device, and the like. Instead, the claimed invention is distinct over the prior art based upon the functionality of the structure within the device to receive video content or image content produced by a plurality of cameras located at the event and permitting the user to choose which of the cameras that the user desires to view while letting the user roam about the event while the event is occurring.

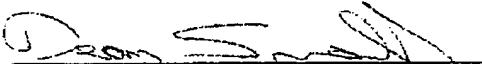
For avoidance of doubt, it should be understood that the claims are not limited to sporting events. Instead, the claims concern any type of live event, such concerts, conferences, presentations, and the like. It is also understood, that the events need not occur in a single contained area, such as in a stadium. For example, sporting events may occur over a large area, such as a Formula One race, a golf match, a tennis tournament at multiple courts, and the like.

For the avoidance of doubt, the distinctions over Busack, and the prior art as a whole, are transmission independent in that the claims are not limited to any particular type of wireless transmission or any particular configuration of transmitters. For example, the receiver in the device may receive image signals over common or different wireless transmissions. The receiver in the device may receive the image signals from common or different transmitters. For example, the audio signals may be transmitted in the UHF frequency range, while the image signals are transmitted at a different frequency range (e.g., 2.5GHz). The image signals may be transmitted over common or different frequencies and may be time-division multiplexed, frequency division multiplexed, code division multiplexed and the like. For the avoidance of doubt, the distinctions over Busack, and the prior art as a whole, the claims are not limited solely to video signals. For example, the image signals may be still images, pictures, frozen images, live video, video clips and the like. The camera may be a video camera, a photographic camera and the like.

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In view of forgoing comments, it is respectfully submitted that the pending claims define allowable subject matter. Should anything remain in order to place the present application in condition for allowance, the examiner is kindly invited to contact the undersigned at the telephone number listed below.

Respectfully Submitted,

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